

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	:	Chapter 11
	:	
W.R. GRACE & Co., et al.,	:	Case No. 01-01139 (JKF)
	:	
Debtors.	:	Jointly Administered
	:	

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that American Employers Insurance Company,
Employers Commercial Union n/k/a OneBeacon America Insurance Company and Unigard
Insurance Company, hereby requests and demands service of all notice and papers herein upon:

DRINKER BIDDLE & REATH LLP
1100 North Market Street, Suite 1000
Wilmington, Delaware 19801-1254
Attn: David P. Primack

DRINKER BIDDLE & REATH LLP
One Logan Square
18th and Cherry Streets
Philadelphia, PA 19103-6996
Attn: Michael F. Brown

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all
pleadings of any kind, including, without limitation, all notices, motions, complaints, and orders,
whether written or oral, formal or informal, however transmitted, related in any way to the
debtors, their property, or their estates. The undersigned requests that its name be added to the
mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Request for Notice and
Demand for Service of Papers (the "Notice") nor any later appearance, pleading, proof of claim,
claim, or suit shall constitute a waiver of (i) the right to have final orders in noncore matters
entered only after de novo review by a District Judge, (ii) the right to trial by jury in any
proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii)

the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (v) an election of remedy, (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: January 4, 2005

/s/ David P. Primack
David P. Primack, Esq. (DE 4449)
DRINKER BIDDLE & REATH LLP
1100 North Market Street, Suite 1000
Wilmington, DE 19801
(302) 467-4200

Attorneys for American Employers
Insurance Company, Employers
Commercial Union n/k/a OneBeacon
America Insurance Company and
Unigard Insurance Company